

1 JEREMY BRYSON #1084207

2 H.D.S.P.

3 P.O. BOX 650

4 Indian Springs, NV 89070

5

6 United States District Court
7 District of Nevada

8

9 Jeremy Bryson
10 Plaintiff

Case No#

2:20-cv-00089 JAD BNW

11

12 -vs-

13 Zuniga, et al
14 Defendants

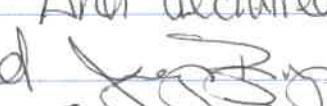
Motion For An ORDER
Compelling Discovery

15

16 Plaintiffs move this court for an ORDER pursuant to
17 Rule 34(a) of the Federal Rules of Civil Procedure
18 compelling Defendants Zuniga, Brian Williams,
19 James Dzurenda to produce for inspection and
20 copying the following documents Listed in Exhibit
21 #1 that were sent to the Attorney General's
22 office on 5/18/2021 - Document Number 21
23 of Bryson vs Zuniga will show Proof of Service,
24 and Court Minutes of Magistrate Acknowledging
25 the document Request's. Plaintiff submitted
26 written Requests Pursuant to Rule 34 on 5/8/2021
27 but have NOT YET RECEIVED the documents

Continued

1 Plaintiff also moves for an order pursuant to Rule
2 37(a)(4) requiring the aforesaid Defendants to
3 pay Plaintiff the sum of \$2,000 dollars as
4 reasonable expenses in obtaining this order, on
5 the ground that Defendants' refusal to Answer the
6 document request, or produce the documents had
7 no substantial justification

8
9 Dated: 8/31/2021 And declared under penalty
10 of perjury signed  1084207
11 JEREMY BRINSON
12 Plaintiff in Pro Se

13
14 HDSP.
15 P.O. BOX 650
16 Indian Spring NV 89070

17 **Order**

18 IT IS ORDERED that ECF No. 26 is DENIED without prejudice. Plaintiff
19 must meet and confer with Defendants under Local Rule IA 1-3(f)
20 before filing a motion to compel. Additionally, a "party who files a motion
21 to which the meet-and-confer requirement applies must submit a
22 declaration stating all meet-and-confer efforts, including the time, place,
23 manner, and participants. The movant must certify that, despite a
24 sincere effort to resolve or narrow the dispute during the meet-and-
confer conference, the parties were unable to resolve or narrow the
dispute without court intervention." LR IA 1-3(f)(2). If Plaintiff meets and
confers with Defendants and refiles his motion, he must also tell the
Court, specifically, which discovery requests he is moving to compel
responses to and why the Defendants' responses are improper.

25 IT IS SO ORDERED

26 DATED: 12:44 pm, September 03, 2021

27 
BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

28 Page 2

HDSP_LawLibrary - Activity in Case 2:20-cv-00089-JAD-BNW Bryson v. Zuniga et al Minute Order

From: <cmechf@nvd.uscourts.gov>
To: <cmechelpdesk@nvd.uscourts.gov>
Date: 5/10/2021 2:59 PM
Subject: Activity in Case 2:20-cv-00089-JAD-BNW Bryson v. Zuniga et al Minute Order

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

*****NOTE TO PUBLIC ACCESS USERS***** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

United States District Court

District of Nevada

Notice of Electronic Filing

The following transaction was entered on 5/10/2021 at 2:58 PM PDT and filed on 5/10/2021

Case Name: Bryson v. Zuniga et al
Case Number: 2:20-cv-00089-JAD-BNW

Filer:

Document Number: 21

Docket Text:

MINUTE ORDER IN CHAMBERS of the Honorable Magistrate Judge Brenda Weksler on 5/10/2021. Re: Discovery documents returned. (Attachments: # (1) Discovery Documents)(Copies have been distributed pursuant to the NEF - DRM)

2:20-cv-00089-JAD-BNW Notice has been electronically mailed to:

Henry Kim hkim@ag.nv.gov, cknigh@ag.nv.gov, cmackerl@ag.nv.gov, mpizzariello@ag.nv.gov, sregalado@ag.nv.gov

HDSP Law Library HDSP_LawLibrary@doc.nv.gov

2:20-cv-00089-JAD-BNW Notice has been delivered by other means to:

The following document(s) are associated with this transaction:

Document description: Main Document

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

JEREMY BRYSON

Plaintiff,

Case No. 2:20-cv-00089-JAD-BNW

v.

MINUTES OF THE COURT

ZUNIGA, et al.

Defendants.

Date: May 10, 2021

PRESENT: THE HONORABLE BRENDA WEKSLER, U.S. MAGISTRATE JUDGE

Deputy Clerk: D.R. Morgan Reporter: NONE APPEARING

Counsel for Plaintiff: NONE APPEARING Counsel for Defendant: NONE APPEARING

MINUTE ORDER IN CHAMBERS:

[X] **DISCOVERY DOCUMENTS:** Unless the court orders otherwise, written discovery, including discovery requests, discovery responses, deposition notices, and deposition transcripts, must not be filed with the court. Your documents are returned herewith. See Local Rule 26-8.

IT IS SO ORDERED.

DEBRA K. KEMPI, CLERK

By: /s/

Deputy Clerk

Certificate of Service By Mailing

I, Jeremy Bryson, hereby certify, pursuant to NRCP 5(b),
that on this day the 7th of May, 2021 I mailed a true and correct
copy of the foregoing "Request of Documents" to the defendants
Zuniga, Brian Williams, James Dzurenda ... To the
Attorney General's office by depositing it in the High Desert
State Prison mail box, fully prepaid, addressed as follows

OFFICE of The Attorney General
ATTN: Henry H. Kim
555 E. Washington Ave., Ste. 3900
Los Vegas, NV 89101

cc. file

Dated: this 7th day of May, 2021



Jeremy Bryson # 1084207
plaintiff / in propria personam
Post office box 450 [ADSP]
Indian Springs, Nevada 89018

EXHIBIT #1

Page 1

1 JEREMY BRYSON #1084207
2 H.D.S.P.

3 P.O. BOX 650

4 Indian Springs, NV 89070

5
6 United States District Court
7 District of NEVADA
8

9 JEREMY BRYSON
10 Plaintiff

CASE NO[#]

2:20-cv-00089 JAD BNW

11 -VS-

12 ZUNIGA, et al.
13 Defendants

* Document REQUEST DIRECTED
to: Zuniga, Brian Williams, James
Dzwenda

14 In accordance with Fed.R.CIV.P. Rule 34, Plaintiff
15 Requests defendant produce the documents listed herein
16 within 30 days, either by making copies and forwarding the same
17 to plaintiff, or by making the requested documents available for
18 Plaintiff's inspection. In accordance with Fed.R.CIV.P. Rule 26
19 Rule 26 Permits the discovery of matters "Relevant to the
20 subject matter involved in the pending action." It is not grounds
21 for objection that the information sought will be inadmissible at the
22 trial if the information sought appears reasonably calculated to
23 lead to the discovery of admissible evidence. For the purposes
24 of discovery relevance is construed broadly to encompass any
25 matter that bears upon, or that could bear upon
26
27
28

1 information which could reasonably lead to other
 2 matters that could bear on any issue that is or may be
 3 in the case. Fund. Inc. v. Sanders 437 U.S. 340 @ 351 [1978]
 4 Failure to timely object within (30) days of this REQUEST
 5 constitutes a waiver of objections. In accordance with
 6 the Fed. R. Crim. Rule 404 (b) evidence of other crimes, wrongs
 7 or acts --- is admissible to prove motive, opportunity,
 8 intent, preparation, Plan, knowledge, Identity, or
 9 absence of mistake. "Document" means written or graphic matter
 10 of every kind or description. However produced, reproduced,
 11 whether in draft, final, or reproduction, not limited to, but
 12 including, written communications, letter, correspondence, memorandums,
 13 notes, Bulletins, Directive, meeting notes, Records of any kind,
 14 photographs, Audio Recording, contracts, agreements, operating
 15 procedures, Regulations, telephone records, meta-DATA, diaries,
 16 desk calenders, NOTIS Records, statements, Reports, computer
 17 records, emails, statistical Abstracts, or any other hard copy
 18 or electronic information. Failure to timely respond to this
 19 Document request may subject you to Court sanctions which
 20 may include monetary and other types of Adverse Sanctions against
 21 you Per Fed. R. Civ. P. Rule 37. Please Identify any and
 22 ALL Documents Being withheld, for any reason, and explain
 23 why this document is being withheld. Any term that is Ambiguous,
 24 then define the term for yourself, then answer the
 25 question or request and include your definition so ascribed.
 26 THE Following Pages list requested "documents" relevant
 27 to this pending Case. All requests include any and All forms.

Documents REQUESTED Continued

of descriptive "document" matter listed in document
description on page #2

"Documents"

- 1 Any and all information, knowledge, plan, document, file ; that has any information about plaintiff being an inmate at (N.D.O.C.) Nevada Department of Corrections.
- 2 Any and All information, known about Plaintiffs injuries, health, safety , or incarcerated situations or investigative info of plaintiff ; being that plaintiff is in a Penal Custody relation while in Custody at (NDOC)
- 3 Any and All known info, documents, files , Identity, OR recordings of (PC) protective Custody Inmates being placed in the very front row, of the transport vehicle, while being transported in the same vehicle with (GP) general population inmates sitting in all of the rows behind the (PC) inmates " who were on the very front Row."
- 4 Any known information of (NDOC.) staff, or employee, of (NDOC.) or (HDS.P) High Desert State Prison, who caused a dangerous situation to the safety of a (PC) inmate by deliberate indifference to the protective policies, and operating procedures put in place, and created to protect (PC) inmates due to their keep

Document Request Continued..

seperate needs; to remain safe from (GP) inmates, who will try to harm them.

- 5 Any known information of Any time in the history of (NDOC) that the U.S. Courts have sanctioned (NDOC) for violating the Rights of an individual in their care.
- 6 Any known information of Plaintiff being forced to transport with the defendant in question % Zuniga, after the High Desert State Prison, and (NDOC) were made aware of this pending action, and the Plaintiffs fear for his safety.
- 7 Any known documents, or information, of the plaintiffs cooperation with the (IG) inspector generals office concerning the murder / homicide of Ralph Goodman at (H.D.S.P) High Desert State Prison, or death of Ralph Goodman; And Any known REASON that Plaintiff came to be an (PC) inmate the day of his death. This ~~now~~ includes all documents, files, of Plaintiff's cooperation with (IG) and therefore his (safety) being put in danger.
- 8 Any known EVIDENCE of Plaintiffs [safety] being in danger by any planned attack of (GP) gangmembers or (GP) inmates, or affiliated prisoners seeking retaliation

Document Requested Continued

9 Any known information, document, of (PC) inmates being injured, or assaulted by policies, practices, or procedures [NOT] being correctly followed; or disregard for following proper procedures by (N.D.O.C) staff, or employees of (N.D.O.C.)

10 Any OR ALL known information, documents, records of (OP) operating procedures; And /or (AR) administrative regulations, That have changed in any way since [June 25th, 2019] due to decisions made to improve the previous (OP) or (AR), finding fault in (OP) or (AR), or procedural deficiencies. This includes, but not limited to: transfers of inmates to court, segregation, protective custody and. Any changes in policies, and practices of any procedure made to improve function after June 25th, 2019.

1 Jeremy Bryson 1084207

2 H.D.S.P.

3 P.O. BOX 1650

4 Indian Springs, NV 89070

5

6 United States District Court
7 District of Nevada

8

9 Jeremy Bryson
10 Plaintiff

case NO # 2:20-cv-00089 JAD BNW

11

12 vs-

13 Zuniga, et al
14 Defendants

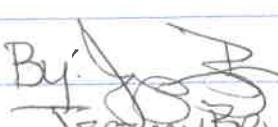
Motion Asking LEAVE for
Extention of Discovery
Deadline

15

16 Plaintiff asks the Court to extend the October
17 deadline of the Discovery Order due to the
18 Plaintiff is being RELEASED from Prison on November
19 15th/2021, Plaintiff is without Counsel, and will
20 need to refile with the Court's, and Plaintiff will
21 need to obtain further Medical Records, Videos, and
22 documents that can be obtained once Released.

23

24 Dated: 8/31/2021

25 Under penalty of Perjury By:  1084207

26

27 Jeremy Bryson
Plaintiff in Pro se